

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: 160 Water Street Inc., 160 Water Street Associates and G.L.O. Management
c/o Richard E. Leff, Esq.,
McGivney & Kluger, P.C.,
80 Broad Street, 23rd Floor,
New York, New York 10004
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PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 160 Water Street, as referenced in the deposition of Louis Francischelli, dated April 26, 2012, on or about each page listed below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Copy of any contracts between One Source and the building in effect on September 11, 2001, as referenced on or about page 22 in the above referenced deposition.
2. Copy of AIG's lease in effect on September 11, 2001 and any documentation related to AIG's occupancy of 160 Water Street, as referenced on or about page 28 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: _____

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